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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JUAN QUINTANILLA VASQUEZ,  
GABRIELA PERDOMO ORTIZ, and  
VICTOR HUGO CATALAN MOLINA,  
individually and on behalf of all others similarly  
situated,

PLAINTIFFS,

vs.

LIBRE BY NEXUS, INC. and JOHN DOES 1-  
50,

DEFENDANTS.

Case No. 4:17-cv-00755

**DECLARATION OF JASON S. RATHOD  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR FEES, COSTS, AND  
SERVICE AWARDS**

Hon. Claudia Wilken

1 I, Jason S. Rathod, declare as follows:

2 1. I am an attorney at law licensed to practice in the District of Columbia and the State  
3 of Illinois. I am also admitted *pro hac vice* in this matter and a partner at Migliaccio & Rathod LLP  
4 (“M&R”), counsel of record for Plaintiffs. I submit this declaration in support of Plaintiffs’ Motion for  
5 Fees, Costs, and Service Awards. Unless otherwise noted, I have personal knowledge of the facts set  
6 forth in this declaration and could and would testify competently to them if called upon to do so.

7 2. In connection with Plaintiffs’ Motion for Preliminary Approval, I submitted a  
8 declaration (*see* Dkt. 134-1, ¶¶ 4-37) that elaborated – in detail and at length – the history of this  
9 litigation and the role of my firm in prosecuting it. I incorporate those paragraphs by reference here. I  
10 also attached M&R’s firm resume (*see* Dkt. 134-1, Exhibit 2 (pp. 93-105 of pdf), and incorporate that  
11 by reference as well. The firm resume sets forth a number of noteworthy consumer protection, civil  
12 rights, and wage theft class action lawsuits that the firm successfully prosecuted. It also presents the  
13 biographies and accomplishments of the attorneys who worked on this case.

14 3. Since the outset of this case, M&R has spent a total 905.80 hours working on this case,  
15 including for the work detailed in my previous declaration (*see* Dkt. 134-1, ¶¶ 4-37), which involved the  
16 following categories, among other things: (1) investigating the merits of the case; (2) coordinating  
17 litigation efforts with co-counsel; (3) drafting and revising Plaintiffs’ Complaint and four Amended  
18 Complaints; (4) engaging in written discovery including writing deficiency letters and engaging in meet  
19 and confer sessions; (5) attending deposition; (6) drafting and filing motions and memoranda; (7)  
20 drafting and reviewing mediation statements; (8) negotiating settlement terms; (9) drafting and revising  
21 settlement documents; (10) presenting argument at the preliminary approval hearing; and (11)  
22 responding to inquiries from class members. The time this reflects was time actually spent, in the  
23 exercise of reasonable judgment by lawyers and staff of M&R. Given the ongoing nature of the notice  
24 program, there will likely be many additional hours not yet recorded for this case, both prior to and  
25 after final approval. The hourly rates shown in the table below<sup>1</sup> for the attorneys and staff at M&R are

26 <sup>1</sup> The table reflects the most recent rates set forth in the adjusted Laffey Matrix, found at  
27 <http://www.laffeymatrix.com/see.html> . The hours and rates are consistent with that in my previous  
28 declaration with a few exceptions, including that I realized some entries from a paralegal (Aema Zaidi)  
were mistakenly attributed to Bruno Ortega-Toledo (a paralegal / law clerk) in my last declaration.  
That error has been corrected. The detailed time entries are appended hereto as **Exhibit A**.

the same as the regular rates – pursuant to the “adjusted Laffey Matrix” – charged by M&R for their services in other cases and as have been approved by state and federal courts across the country. For example, M&R’s rates were recently approved by Magistrate Judge Ryu in a class action settlement. *See Carlotti v. Asus Comput. Int’l*, No. 18-cv-03369-DMR, 2020 U.S. Dist. LEXIS 108917, at \*17 (N.D. Cal. June 22, 2020). M&R’s rates were also recently approved in a collective action settlement in the United States District Court for the Eastern District of Michigan. *See Whitfield v. Trinity Rest. Grp., LLC*, No. 18-10973, 2019 U.S. Dist. LEXIS 182055 (E.D. Mich. Oct. 3, 2019). M&R’s rates were also approved in *Singer, et al. v. Postmates*, No. 4:15-cv-01284-JSW (N.D. Cal. April 25, 2018) (Dkt. 98), where M&R served as co-counsel in a multistate wage theft class and collective action.

Timekeeper	Position	Hours	Rate	Total
Nicholas Migliaccio	Partner	52.75	\$759	\$40,037.25
Jason Rathod	Partner	717.60	\$759	\$544,658.40
Erick Quezada	Associate	97.3	\$378	\$36,779.40
Ashley Pileika	Associate	14.5	\$378	\$5,481.00
Bruno Ortega	Law Clerk	0.5	\$103	\$103
Dominique Reid	Law Clerk	16	\$206	\$3,296
Aema Zaidi	Paralegal	7.15	\$206	\$1,472.90
<b>TOTAL</b>		905.80		\$633,270.25

4. From now through final approval and, if approved, through the date of disbursement, there will be significant, additional work that M&R and Class Counsel will need to undertake. We will need to ensure that all inquiries from Settlement Class Members are timely and accurately handled. We will receive updates from the Settlement Administrator regarding the administration of the settlement and follow-up as necessary, including with inquiries received from class members. We will prepare for and appear at the fairness hearing. If the settlement is approved and fees awarded, we also will oppose any appeals that may be filed. Under the terms of the settlement, we will also need to monitor LBN’s

finances to determine if it meets the thresholds triggering payments into the settlement fund, and will do so.

5. Expenses are accounted for and billed separately and are not duplicated in my professional billing rate. M&R has not received reimbursement for expenses incurred in connection with this litigation. As of September 1, 2020, M&R incurred a total of \$18,280.24<sup>2</sup> in unreimbursed actual third-party expenses in connection with the prosecution of these cases. The actual expenses incurred in the prosecution of these cases are reflected on the computerized accounting records of my firm, based on receipts and check records, and accurately reflect all actual expenses incurred. These unreimbursed costs and expenses were incurred in connection with the effective prosecution of this litigation and include mediation, travel, translation and process server fees. I have included a table below summarizing

<b>Court Costs (<i>e.g.</i>, <i>pro hac</i> <i>vice</i> fees)</b>	<b>Translation Costs (for retainer)</b>	<b>Process Server Costs (for subpoenas)</b>	<b>Travel (<i>e.g.</i>, Flights, Accommodations, and Meals)</b>	<b>Mediation Costs</b>	<b>Total</b>
\$620	\$481.50	\$946.35	\$7,382.95	\$8,849.44	\$18,280.24

6. In accepting this case, Plaintiffs' Counsel bore considerable risk. M&R took this case on a fully contingent basis, meaning that we were not paid for any of our time, and that we paid all costs and out of pocket expenses without any reimbursement to date. During the pendency of this case, M&R turned away other work. In evaluating the case at the outset, my partner and I recognized that M&R would be contributing a substantial amount of time and advancing significant costs in prosecuting a class action, with no guarantee of compensation or recovery, in the hopes of prevailing against a highly skilled and well-funded defense.

I declare under penalty of perjury of the laws of the United States and the State of California that the foregoing is true and correct. Executed on September 1, 2020 in Washington D.C.

<sup>2</sup> This amount is slightly less than that presented in my original declaration. In my original accounting, I appear to have mistakenly counted amounts attached to internal journal entries in my firm's bookkeeping program as expenses when they were not. The amounts set forth herein are accurate and submitted after receiving additional scrutiny.

Dated: September 1, 2020

Respectfully submitted,

By: /s/ Jason S. Rathod  
Jason S. Rathod

**MIGLICACCIO & RATHOD LLP**

JASON S. RATHOD, *pro hac vice*

412 H St NE, Suite 302

Washington, DC 20002

Telephone (202) 470-3520

jrathod@classlawdc.com

# EXHIBIT A

First Name	Last Name	Position	Date	Hours	Rate	Lodestar	Task Description
Aema	Zaidi	Paralegal	6/15/2017	0.75	206	154.5	Assist with processing plaintiff discovery production
Aema	Zaidi	Paralegal	10/27/2017	1	206	206	Assist with responding to CID
Aema	Zaidi	Paralegal	10/30/2017	1.5	206	309	Assist with responding to CID
Aema	Zaidi	Paralegal	10/31/2017	1.1	206	226.6	Assist with responding to CID
Aema	Zaidi	Paralegal	11/1/2017	2.8	206	576.8	Assist with responding to CID
				7.15		1472.9	
Ashley	Pileika	Associate	12/21/2016	1	378	378	Review investigation materials to prep for intakes and assisting with translating Spanish client intakes.
Ashley	Pileika	Associate	12/22/2016	1	378	378	Draft and revise intake questions for potential clients and translate to Spanish; research best legal terms in Spanish, as needed.
Ashley	Pileika	Associate	12/23/2016	1.5	378	567	Intake call with potential client; translate notes into Spanish.
Ashley	Pileika	Associate	12/28/2016	2	378	756	Intake call with potential client; translate notes into Spanish.
Ashley	Pileika	Associate	1/12/2017	2	378	756	Intake call with potential client; translate notes into Spanish.
Ashley	Pileika	Associate	1/26/2017	1.5	378	567	Assist with translation of client retainer into Spanish.
Ashley	Pileika	Associate	1/26/2017	3	378	1134	Assist in investigation
Ashley	Pileika	Associate	1/27/2017	2.5	378	945	Intake call with potential client; translate notes into Spanish.
				14.5		5481	
Bruno	Ortega-Toledo	Law Clerk	10/23/2018	0.5	206	103	Assist with exhibit preparation
						103	
Dominique	Reid	Law Clerk	2/9/2018	2.25	206	463.5	Researched remedy for violation of california civil code § 1632
Dominique	Reid	Law Clerk	2/9/2018	0.75	206	154.5	Continued to research section 1632 remedies
Dominique	Reid	Law Clerk	2/12/2018	3.25	206	669.5	Continued to research remedies for violation of 1632
Dominique	Reid	Law Clerk	2/13/2018	8.25	206	1699.5	Researched remedies for 1632 violation and wrote memo
Dominique	Reid	Law Clerk	2/14/2018	1	206	206	Continued to work on 1632 remedies memo
Dominique	Reid	Law Clerk	2/14/2018	0.5	206	103	Made edits to 1632 memo
				16		3296	
Erick	Quezada	Associate	8/31/2018	0.5	378	189	Reviewed Plaintiff's Second Amended Complaint to gather relevant information and documents needed in discovery
Erick	Quezada	Associate	8/31/2018	0.25	378	94.5	Reviewed Mediation Statement to gather relevant information and documents needed in discovery
Erick	Quezada	Associate	8/31/2018	0.25	378	94.5	Reviewed Order Denying Motion to Compel Arbitration to gather relevant information and documents needed in discovery
Erick	Quezada	Associate	8/31/2018	0.5	378	189	Reviewed Motion to Dismiss to gather relevant information and documents needed in discovery
Erick	Quezada	Associate	8/31/2018	0.5	378	189	Drafted outline for first draft of Plaintiffs' second set of Document requests
Erick	Quezada	Associate	8/31/2018	0.75	378	283.5	Drafted Plaintiffs' Second Set of requests for document production
Erick	Quezada	Associate	9/14/2018	1	378	378	Drafted Plaintiffs' First Set of Interrogatories
Erick	Quezada	Associate	9/14/2018	0.5	378	189	Revised Plaintiffs' second set of interrogatories
Erick	Quezada	Associate	9/14/2018	0.25	378	94.5	Conferred with co-counsel Jason Rathod regarding Plaintiffs' discovery requests
Erick	Quezada	Associate	9/24/2018	1.5	378	567	Researched FOIA procedures for California Department of Insurance
Erick	Quezada	Associate	9/24/2018	0.5	378	189	Drafted FOIA requests regarding Libre by Nexus
Erick	Quezada	Associate	10/11/2018	0.25	378	94.5	Conducted research regarding procedures for third-party subpoenas
Erick	Quezada	Associate	10/17/2018	0.75	378	283.5	Reviewed Docket and Notes in preparation for drafting third-party subpoenas
Erick	Quezada	Associate	10/18/2018	0.75	378	283.5	Drafted third-party subpoena to A to Z Bail Bonds
Erick	Quezada	Associate	10/18/2018	0.25	378	94.5	Edited third-party subpoena to A to Z bonds
Erick	Quezada	Associate	10/18/2018	0.25	378	94.5	Researched contact information for corporate representative of A to Z Bonds
Erick	Quezada	Associate	10/19/2018	0.5	378	189	Reviewed Defendant's Motion to Stay
Erick	Quezada	Associate	10/19/2018	1.25	378	472.5	Drafted outline to Plaintiffs' opposition to motion to stay
Erick	Quezada	Associate	10/21/2018	0.5	378	189	Drafted Introduction to Plaintiffs' opposition to Motion to Stay
Erick	Quezada	Associate	10/21/2018	0.25	378	94.5	Drafted legal standard to Plaintiffs' opposition to Motion to Stay

Erick	Quezada	Associate	10/21/2018	0.5	378	189	Drafted argument section A, substantial question analysis to Plaintiffs' opposition to Motion to Stay
Erick	Quezada	Associate	10/21/2018	0.75	378	283.5	Drafted section B of argument, balance of hardships, to Plaintiffs' opposition to Motion to Stay
Erick	Quezada	Associate	10/21/2018	1.5	378	567	Conducted research regarding the standards for leave to amend
Erick	Quezada	Associate	10/21/2018	0.75	378	283.5	Conducted research regarding the good cause requirements for a request for leave to amend
Erick	Quezada	Associate	10/21/2018	0.5	378	189	Conducted research regarding the undue delay requirements for a request for leave to amend
Erick	Quezada	Associate	10/21/2018	0.25	378	94.5	Conducted research regarding the undue prejudice requirements for a request for leave to amend
Erick	Quezada	Associate	10/21/2018	0.5	378	189	Conducted research regarding the futility requirements for a request for leave to amend
Erick	Quezada	Associate	10/25/2018	0.5	378	189	Conducted Research regarding Motion requirements for Motion for leave to amend
Erick	Quezada	Associate	8/7/2019	0.25	378	94.5	Confirmed access to Defendant's discovery.
Erick	Quezada	Associate	8/7/2019	2	378	756	Reviewed and annotated the discovery produced by Defendant Libre
Erick	Quezada	Associate	8/13/2019	0.25	378	94.5	reviewed prior deficiency letter sent to Libre
Erick	Quezada	Associate	8/13/2019	4.75	378	1795.5	Reviewed Defendant's production of documents
Erick	Quezada	Associate	8/13/2019	0.25	378	94.5	Reviewed deficiency letter containing Plaintiff's agreed clarifications and specifications
Erick	Quezada	Associate	8/13/2019	0.75	378	283.5	Prepared memo regarding notes on Libre's production
Erick	Quezada	Associate	11/25/2019	0.9	378	340.2	Drafted argument section regarding Rule 23 requirements for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	11/25/2019	0.6	378	226.8	Drafted argument section regarding the predominance requirement for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	11/25/2019	1.5	378	567	Drafted procedural background section for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	11/25/2019	0.7	378	264.6	Reviewed docket for drafting background section for preliminary approval of class action settlement.
Erick	Quezada	Associate	11/25/2019	0.4	378	151.2	Reviewed settlement agreement to draft motion for preliminary approval.
Erick	Quezada	Associate	11/25/2019	4	378	1512	Drafted terms of the proposed settlement for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	11/26/2019	3.5	378	1323	Conducted research regarding settlement standards in the Northern District of California.
Erick	Quezada	Associate	11/26/2019	2.5	378	945	Conducted research regarding substantive concerns of class action settlements.
Erick	Quezada	Associate	11/26/2019	2.1	378	793.8	Drafted argument section regarding substantive concerns for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	11/26/2019	1.2	378	453.6	Edited argument section regarding substantive concerns for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	12/1/2019	5.6	378	2116.8	Drafted argument section for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	12/2/2019	1.75	378	661.5	Drafted motion for preliminary approval of class settlement.
Erick	Quezada	Associate	12/3/2019	0.8	378	302.4	Reviewed settlement agreement for motion for preliminary approval.
Erick	Quezada	Associate	12/3/2019	0.8	378	302.4	Drafted motion for leave to file a fourth amended complaint.
Erick	Quezada	Associate	12/3/2019	1.2	378	453.6	Drafted procedural concerns section for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	12/3/2019	2.9	378	1096.2	Drafted substantive concerns section for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	12/3/2019	2.5	378	945	Conducted research regarding approval of attorney's fees for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	12/3/2019	2	378	756	Drafted section on the approval of attorneys' fees and expenses for motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	12/4/2019	5.5	378	2079	Edited Motion for Preliminary Approval
Erick	Quezada	Associate	12/11/2019	4.6	378	1738.8	Edited preliminary approval motion.
Erick	Quezada	Associate	12/19/2019	1.9	378	718.2	Reviewed Defendant's counter edits to the settlement agreement.
Erick	Quezada	Associate	2/3/2020	0.5	378	189	Reviewed edits and comments to the settlement agreement.
Erick	Quezada	Associate	2/5/2020	1.8	378	680.4	Conducted research regarding standards for approval of class action settlement in the Northern District of California.
Erick	Quezada	Associate	2/5/2020	0.8	378	302.4	Drafted Notice of motion.
Erick	Quezada	Associate	2/5/2020	0.4	378	151.2	Edited introduction to motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	2/5/2020	0.8	378	302.4	Edited procedural background to motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	2/5/2020	4.3	378	1625.4	Edited argument section to motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	2/6/2020	1.6	378	604.8	Edited Plaintiff's motion for preliminary approval of class action.
Erick	Quezada	Associate	2/6/2020	0.8	378	302.4	Added tables to motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	2/10/2020	1.2	378	453.6	Assisted in drafting declaration of Jason Rathod in support of motion for preliminary approval of class action settlement.
Erick	Quezada	Associate	2/13/2020	1.8	378	680.4	Drafted joint status report and stipulation staying the case.
Erick	Quezada	Associate	2/13/2020	0.7	378	264.6	Edited joint status report and stipulation staying the case.
Erick	Quezada	Associate	2/13/2020	0.4	378	151.2	Reviewed case docket in preparation to draft joint status report and stipulation staying the case.
Erick	Quezada	Associate	2/13/2020	0.8	378	302.4	Drafted proposed order for the Parties' joint status report and stipulation staying the case.
Erick	Quezada	Associate	2/14/2020	0.4	378	151.2	Reviewed counsel's comments to Plaintiff's draft of the Settlement Complaint.



Erick	Quezada	Associate	2/14/2020	1.7	378	642.6	Edited Plaintiff's Settlement Complaint.
Erick	Quezada	Associate	2/14/2020	0.5	378	189	Edited motion for leave to file the fourth amended complaint.
Erick	Quezada	Associate	5/5/2020	0.2	378	75.6	Reviewed docket for timeline of final approval briefing.
Erick	Quezada	Associate	5/7/2020	0.4	378	151.2	Reviewed Counsel's comments and edits on Plaintiff's amended Settlement Complaint.
Erick	Quezada	Associate	6/2/2020	0.4	378	151.2	Edited rates for calculation of attorneys' rates for Plaintiffs' settlement approval brief.
Erick	Quezada	Associate	6/2/2020	0.7	378	264.6	Reviewed attorneys' hours report worked for Plaintiffs' settlement brief.
Erick	Quezada	Associate	6/2/2020	0.6	378	226.8	Drafted section on attorneys' fees for Jason S. Rathod's declaration in support of Plaintiffs settlement brief.
Erick	Quezada	Associate	6/2/2020	1.1	378	415.8	Edited Plaintiffs' settlement brief with additional information from settlement administrator.
Erick	Quezada	Associate	6/2/2020	0.5	378	189	Conducted research regarding the application of attorneys' fee rates for Plaintiffs' settlement brief.
Erick	Quezada	Associate	6/2/2020	1.5	378	567	Reviewed Defendant's production of documents to fill in additional information into Plaintiffs' brief in support of Class Settlement and s
Erick	Quezada	Associate	7/21/2020	0.8	378	302.4	Reviewed Defendant's production of documents for class members' contracts with Defendant.
Erick	Quezada	Associate	7/21/2020	0.2	378	75.6	Reviewed notes on Defendant's discovery production.
Erick	Quezada	Associate	8/31/2020	0.7	378	264.6	Fielded calls from class members regarding settlement administration.
				97.3		36779.4	
Jason	Rathod	Partner	11/16/2016	1	759	759	Investigate potential case
Jason	Rathod	Partner	11/16/2016	1.5	759	1138.5	Investigate potential case, review complaints
Jason	Rathod	Partner	11/17/2016	1	759	759	Investigate potential case
Jason	Rathod	Partner	11/17/2016	1	759	759	Investigate potential case, review complaints
Jason	Rathod	Partner	11/22/2016	2.25	759	1707.75	Follow-up with intakes
Jason	Rathod	Partner	11/22/2016	0.5	759	379.5	Investigate potential case
Jason	Rathod	Partner	11/23/2016	1	759	759	Follow-up re potential intakes
Jason	Rathod	Partner	11/30/2016	3.25	759	2466.75	Investigate potential case
Jason	Rathod	Partner	11/30/2016	2	759	1518	investigate potential case; research legal claims
Jason	Rathod	Partner	12/1/2016	0.75	759	569.25	call with potential client's counsel
Jason	Rathod	Partner	12/6/2016	0.75	759	569.25	follow-up with potential leads
Jason	Rathod	Partner	12/7/2016	0.5	759	379.5	follow-up with nonprofits including centro de legal
Jason	Rathod	Partner	12/9/2016	0.75	759	569.25	follow-up with nonprofits re leads
Jason	Rathod	Partner	12/10/2016	0.25	759	189.75	follow-up with nonprofit lead
Jason	Rathod	Partner	12/12/2016	2.5	759	1897.5	research potential claims, formulate additional intake questions
Jason	Rathod	Partner	12/13/2016	0.75	759	569.25	follow-up with non-profits re investigation
Jason	Rathod	Partner	12/18/2016	0.25	759	189.75	follow-up with lead
Jason	Rathod	Partner	12/19/2016	0.5	759	379.5	follow-up with lead
Jason	Rathod	Partner	12/21/2016	1	759	759	intake call with potential california client and counsel and prep re same
Jason	Rathod	Partner	1/10/2017	0.75	759	569.25	Em cocounsel J Kaliei re intake
Jason	Rathod	Partner	1/11/2017	0.75	759	569.25	intake call
Jason	Rathod	Partner	1/24/2017	0.5	759	379.5	Investigate potential case including follow-up with intake
Jason	Rathod	Partner	1/24/2017	1.75	759	1328.25	Emails re retainer
Jason	Rathod	Partner	1/24/2017	0.5	759	379.5	Follow-up with potential clients and their representatives
Jason	Rathod	Partner	1/26/2017	3	759	2277	attend immigration cle / talk with counsel for leads
Jason	Rathod	Partner	1/27/2017	1	759	759	follow-up with nonprofits re status / intakes
Jason	Rathod	Partner	1/27/2017	2.5	759	1897.5	edit/research complaint
Jason	Rathod	Partner	1/29/2017	5.25	759	3984.75	edit/research complaint
Jason	Rathod	Partner	1/30/2017	4.5	759	3415.5	research / edit complaint
Jason	Rathod	Partner	1/31/2017	1	759	759	coordinating with potential cocounsel re collaboration on case
Jason	Rathod	Partner	1/31/2017	1.75	759	1328.25	review/edit complaint
Jason	Rathod	Partner	2/1/2017	0.5	759	379.5	review complaint
Jason	Rathod	Partner	2/1/2017	1	759	759	review/edit complaint
Jason	Rathod	Partner	2/2/2017	1.5	759	1138.5	f/u with additional leads

Jason	Rathod	Partner	2/3/2017	0.75	759	569.25	Emails with J Kalie / research re complaint / coordinating finalizing client
Jason	Rathod	Partner	2/6/2017	1.25	759	948.75	Research re complaint, conferences with cocounsel, coordinate translation of complaint
Jason	Rathod	Partner	2/7/2017	1.25	759	948.75	Review complaint; review and send JPA
Jason	Rathod	Partner	2/8/2017	1	759	759	Edit complaint; coordinate re JPA, filing
Jason	Rathod	Partner	2/9/2017	1.5	759	1138.5	Edit complaint, finalize with team
Jason	Rathod	Partner	2/10/2017	1	759	759	Finalize filing
Jason	Rathod	Partner	2/12/2017	1.25	759	948.75	Edit and finalize complaint
Jason	Rathod	Partner	2/13/2017	0.75	759	569.25	Finalize complaint
Jason	Rathod	Partner	2/15/2017	1.5	759	1138.5	Review complaint filing, circulate to team
Jason	Rathod	Partner	2/16/2017	0.5	759	379.5	Emails re statements made by Defendant about litigation
Jason	Rathod	Partner	2/17/2017	0.5	759	379.5	Emails re responding to third party inquiries
Jason	Rathod	Partner	2/27/2017	1.25	759	948.75	Emails and research re improper communication with clients
Jason	Rathod	Partner	3/2/2017	0.75	759	569.25	Emails re next steps, including getting more plaintiffs
Jason	Rathod	Partner	3/3/2017	0.5	759	379.5	Emails re potential Va. client
Jason	Rathod	Partner	3/3/2017	1	759	759	Emails / calls re Defendant contacts with plaintiffs
Jason	Rathod	Partner	3/9/2017	0.75	759	569.25	Emails re potential admissions in article
Jason	Rathod	Partner	4/2/2017	1	759	759	edit amended complaint
Jason	Rathod	Partner	4/3/2017	4	759	3036	edit amended complaint
Jason	Rathod	Partner	4/4/2017	6.5	759	4933.5	edit complaint
Jason	Rathod	Partner	4/13/2017	1	759	759	Emails re amended complaint
Jason	Rathod	Partner	4/14/2017	0.25	759	189.75	review Molina letter
Jason	Rathod	Partner	4/17/2017	1	759	759	Draft FOIAs
Jason	Rathod	Partner	4/21/2017	1	759	759	edit complaint
Jason	Rathod	Partner	4/24/2017	5.5	759	4174.5	edit complaint
Jason	Rathod	Partner	4/27/2017	1	759	759	edit complaint
Jason	Rathod	Partner	4/28/2017	2	759	1518	edit complaint
Jason	Rathod	Partner	5/2/2017	2	759	1518	review complaint
Jason	Rathod	Partner	5/12/2017	0.5	759	379.5	Proposal re 1532 claim as loan secured by bracelet
Jason	Rathod	Partner	5/15/2017	0.25	759	189.75	Review joint cmc
Jason	Rathod	Partner	5/18/2017	0.5	759	379.5	meeting / f/u call w J. Kalie
Jason	Rathod	Partner	5/24/2017	0.5	759	379.5	edits to 30(b)(6)
Jason	Rathod	Partner	5/25/2017	1	759	759	Edits to RFPs
Jason	Rathod	Partner	5/25/2017	1.5	759	1138.5	Discussion re peonage/forced labor claims and research re same
Jason	Rathod	Partner	5/26/2017	0.5	759	379.5	Correspondence re peonage / forced labor claims
Jason	Rathod	Partner	6/7/2017	0.5	759	379.5	Coordinate with Centro / Aema re plaintiff discovery production
Jason	Rathod	Partner	6/8/2017	0.15	759	113.85	Coordinating team call
Jason	Rathod	Partner	6/13/2017	0.25	759	189.75	Email re cosigners and deps
Jason	Rathod	Partner	6/20/2017	0.25	759	189.75	Review emails re Libre doc production
Jason	Rathod	Partner	6/21/2017	1.5	759	1138.5	Prep for 30(B)(6) depo
Jason	Rathod	Partner	6/22/2017	6.5	759	4933.5	Prep and attend 30(B)(6) depo
Jason	Rathod	Partner	6/23/2017	7.5	759	5692.5	Prepare discovery responses
Jason	Rathod	Partner	6/26/2017	2	759	1518	Produce discovery responses
Jason	Rathod	Partner	6/28/2017	0.5	759	379.5	Edit dep prep script to add redirect
Jason	Rathod	Partner	7/7/2017	1.25	759	948.75	Draft deficiency letter
Jason	Rathod	Partner	7/7/2017	0.25	759	189.75	Team call
Jason	Rathod	Partner	7/11/2017	2	759	1518	edit and finalize deficiency letter
Jason	Rathod	Partner	7/21/2017	3.5	759	2656.5	Prepare and serve third party subpoenas
Jason	Rathod	Partner	7/25/2017	0.25	759	189.75	Strategy emails re depositions of case managers
Jason	Rathod	Partner	7/27/2017	1	759	759	Call re discovery deficiencies and prep re same

Jason	Rathod	Partner	8/22/2017	0.75	759	569.25	Research re ankle monitor alternatives
Jason	Rathod	Partner	8/27/2017	3	759	2277	Insert procedural history in mediation statement
Jason	Rathod	Partner	9/7/2017	2	759	1518	Edit mediation statement
Jason	Rathod	Partner	10/6/2017	0.75	759	569.25	Review CFPB CID
Jason	Rathod	Partner	10/8/2017	0.75	759	569.25	Mediation prep
Jason	Rathod	Partner	10/9/2017	10	759	7590	Mediation travel, prep, meeting
Jason	Rathod	Partner	10/10/2017	14	759	10626	Mediation, prep, and travel re same
Jason	Rathod	Partner	10/11/2017	5.5	759	4174.5	Travel for mediation
Jason	Rathod	Partner	10/16/2017	0.75	759	569.25	Emails with cocounsel and opposing counsel re CID
Jason	Rathod	Partner	10/23/2017	1	759	759	Update email re CFPB CID
Jason	Rathod	Partner	10/23/2017	0.5	759	379.5	Call re CFPB CID
Jason	Rathod	Partner	10/24/2017	0.75	759	569.25	Coordinate with Centro, Aema (paralegal) re redactions and production for CFPB
Jason	Rathod	Partner	10/25/2017	1.25	759	948.75	Coordinate with Aema (paralegal), centro re redactions for CFPB
Jason	Rathod	Partner	10/27/2017	1	759	759	Coordinate with Aema (paralegal), Centro re redactions and production for CFPB
Jason	Rathod	Partner	10/30/2017	2	759	1518	Read and redact for CFPB
Jason	Rathod	Partner	10/31/2017	2	759	1518	Review and redact for CFPB
Jason	Rathod	Partner	11/1/2017	5.5	759	4174.5	Redact and produce to CFPB
Jason	Rathod	Partner	11/21/2017	1.5	759	1138.5	Strategy call / meeting with co-counsel re next steps
Jason	Rathod	Partner	12/1/2017	0.25	759	189.75	Emails re follow-up inquiries from detainees unable to communicate with Libre
Jason	Rathod	Partner	12/5/2017	0.25	759	189.75	Emails re CFPB, other updates
Jason	Rathod	Partner	1/25/2018	0.25	759	189.75	Review and finalize stipulation
Jason	Rathod	Partner	2/8/2018	1.5	759	1138.5	Call re new fee schedule, strategy, prep re same
Jason	Rathod	Partner	2/12/2018	0.75	759	569.25	Confer with Dominique (law clerk) re rescission memo, review same
Jason	Rathod	Partner	2/13/2018	1	759	759	Confer with Dominique (law clerk) re rescission memo, review same
Jason	Rathod	Partner	2/14/2018	1	759	759	Confer with Dominique (law clerk) re rescission memo, review same
Jason	Rathod	Partner	2/19/2018	0.25	759	189.75	Update client
Jason	Rathod	Partner	2/20/2018	0.75	759	569.25	Emails re strategy for upcoming mediation, receiving supplemental doc production
Jason	Rathod	Partner	2/21/2018	0.5	759	379.5	Team strategy call and prep re same
Jason	Rathod	Partner	3/1/2018	0.5	759	379.5	Confer re Libre offer to help pay bond
Jason	Rathod	Partner	3/20/2018	1	759	759	Call with opposing counsel and co-counsel and prep re same
Jason	Rathod	Partner	3/21/2018	0.25	759	189.75	Review data request email
Jason	Rathod	Partner	3/25/2018	4	759	3036	Mediation statement
Jason	Rathod	Partner	3/26/2018	2	759	1518	Mediation statement
Jason	Rathod	Partner	3/27/2018	2.25	759	1707.75	Edit and finalize mediation statement
Jason	Rathod	Partner	3/27/2018	1.25	759	948.75	Strategy call with co-counsel
Jason	Rathod	Partner	3/28/2018	10	759	7590	Travel for mediation
Jason	Rathod	Partner	3/30/2018	9	759	6831	prep and attend mediation
Jason	Rathod	Partner	3/30/2018	0.25	759	189.75	Emails/ recap re mediation
Jason	Rathod	Partner	4/3/2018	4	759	3036	Research / email re potential angle on UCL claim
Jason	Rathod	Partner	4/9/2018	1.5	759	1138.5	Review / discuss email from Judge Lambden
Jason	Rathod	Partner	4/10/2018	1	759	759	Research and email re new potential UCL theory
Jason	Rathod	Partner	4/11/2018	0.75	759	569.25	Team strategy call and prep re same
Jason	Rathod	Partner	4/12/2018	1	759	759	Emails re decision on settlement or continuing case
Jason	Rathod	Partner	4/17/2018	0.5	759	379.5	team call re strategy and next steps
Jason	Rathod	Partner	4/24/2018	0.25	759	189.75	Emails re details of Libre system
Jason	Rathod	Partner	5/11/2018	0.5	759	379.5	new intake
Jason	Rathod	Partner	5/25/2018	1	759	759	Email re schedule
Jason	Rathod	Partner	6/5/2018	0.5	759	379.5	call re schedule / strategy, next steps
Jason	Rathod	Partner	6/8/2018	0.75	759	569.25	research and email re McGill decision for opposition to motion to compel arbitration

Jason	Rathod	Partner	6/11/2018	0.75	759	569.25	Review / edit Rule 11 brief
Jason	Rathod	Partner	6/11/2018	2.5	759	1897.5	Draft opposition to Motion to Compel arbitration
Jason	Rathod	Partner	6/12/2018	6	759	4554	Draft opposition to Motion to Compel arbitration
Jason	Rathod	Partner	6/13/2018	1	759	759	Draft opposition to Motion to Compel arbitration
Jason	Rathod	Partner	6/14/2018	0.75	759	569.25	Review / edit opposition to motion to compel brief re language translation / fraud in the execution issue
Jason	Rathod	Partner	6/14/2018	1.5	759	1138.5	Edit opposition to Motion to Compel McGill section
Jason	Rathod	Partner	6/19/2018	0.2	759	151.8	Review briefing
Jason	Rathod	Partner	8/9/2018	0.75	759	569.25	Strategy call re discovery, other oressing issues, preparation re same
Jason	Rathod	Partner	8/10/2018	1	759	759	Emails and research for opposition to motion to compel arbitration to assist cocounsel in preparation for oral argument
Jason	Rathod	Partner	8/13/2018	1	759	759	Emails to cocounsel re preparation for oral argument on motion to compel arbitration
Jason	Rathod	Partner	8/14/2018	0.25	759	189.75	Emails to cocounsel re preparation for oral argument on motion to compel arbitration
Jason	Rathod	Partner	8/28/2018	1	759	759	Emails and conferences with E. Quezada re next steps for discovery in Libre
Jason	Rathod	Partner	8/31/2018	0.25	759	189.75	Review discovery prepared by E. Quezada
Jason	Rathod	Partner	9/5/2018	1	759	759	Emails re order and possible amendment for 1632 claim
Jason	Rathod	Partner	9/5/2018	1.75	759	1328.25	Draft RFPs
Jason	Rathod	Partner	9/7/2018	1	759	759	Emails re decision on whether to amend 1632 claim
Jason	Rathod	Partner	9/17/2018	2.5	759	1897.5	Draft interrogatories
Jason	Rathod	Partner	9/18/2018	1	759	759	Emails re Libre's notice of appeal
Jason	Rathod	Partner	9/18/2018	1.5	759	1138.5	Draft additional discovery requests
Jason	Rathod	Partner	9/20/2018	5	759	3795	Research re new common damages theory / DOI regulations. Email to team re same
Jason	Rathod	Partner	9/20/2018	2	759	1518	Draft additional discovery requests
Jason	Rathod	Partner	10/10/2018	1	759	759	Review defendant's briefs
Jason	Rathod	Partner	10/11/2018	0.25	759	189.75	Emails re changing schedule
Jason	Rathod	Partner	10/17/2018	2	759	1518	Draft amended complaint
Jason	Rathod	Partner	10/17/2018	2	759	1518	Conference call; prep re same; emails re same concerning exemplar submissions for shortening time
Jason	Rathod	Partner	10/18/2018	1.5	759	1138.5	Draft amended Complaint
Jason	Rathod	Partner	10/18/2018	0.5	759	379.5	Conferences with E Quezada re Libre Motion to stay
Jason	Rathod	Partner	10/19/2018	2	759	1518	Draft third party subpoenas
Jason	Rathod	Partner	10/21/2018	3	759	2277	Draft amended complaint
Jason	Rathod	Partner	10/21/2018	2	759	1518	Opposition to motion to stay
Jason	Rathod	Partner	10/21/2018	1.5	759	1138.5	Draft motion to amend
Jason	Rathod	Partner	10/21/2018	0.25	759	189.75	Draft and send meet and confer email to defense counsel
Jason	Rathod	Partner	10/22/2018	2.25	759	1707.75	Draft motion to amend
Jason	Rathod	Partner	10/22/2018	2.75	759	2087.25	Draft motion to extend
Jason	Rathod	Partner	10/22/2018	7	759	5313	Draft Opposition to Motion to Stay
Jason	Rathod	Partner	10/23/2018	6	759	4554	Draft Opposition to Motion to Stay
Jason	Rathod	Partner	10/23/2018	3.25	759	2466.75	Draft subpoenas, inquire about service
Jason	Rathod	Partner	10/24/2018	1	759	759	Serve subpoenas
Jason	Rathod	Partner	10/25/2018	3.75	759	2846.25	Draft motion to amend
Jason	Rathod	Partner	10/25/2018	2	759	1518	Draft motion to Extend
Jason	Rathod	Partner	10/26/2018	4	759	3036	Draft motion to extend
Jason	Rathod	Partner	10/26/2018	4.5	759	3415.5	Draft motion to amend
Jason	Rathod	Partner	10/26/2018	0.75	759	569.25	Call with defense counsel re motions; prepare re same
Jason	Rathod	Partner	10/29/2018	2.5	759	1897.5	Draft motion to extend
Jason	Rathod	Partner	10/29/2018	3.25	759	2466.75	Draft motion for leave to file amended complaint
Jason	Rathod	Partner	10/30/2018	0.75	759	569.25	Review appeal and motion to stay
Jason	Rathod	Partner	11/5/2018	1.5	759	1138.5	Settlement meeting with opposing counsel and preparation re same
Jason	Rathod	Partner	11/7/2018	1.5	759	1138.5	Discussion with opposing counsel re settlement
Jason	Rathod	Partner	11/7/2018	0.5	759	379.5	Emails re third party subpoena extensions

Jason	Rathod	Partner	11/9/2018	1	759	759	Emails re subpoenas to third parties
Jason	Rathod	Partner	11/14/2018	2	759	1518	Research and emails re licensure issue
Jason	Rathod	Partner	11/15/2018	2.5	759	1897.5	Research and emails re licensure issue
Jason	Rathod	Partner	11/19/2018	2.5	759	1897.5	Read and revise reply brief
Jason	Rathod	Partner	11/19/2018	2.25	759	1707.75	Edit term sheet document
Jason	Rathod	Partner	11/19/2018	0.5	759	379.5	Settlement call with opposing counsel
Jason	Rathod	Partner	11/20/2018	1	759	759	Call re settlement and prep re same
Jason	Rathod	Partner	11/20/2018	1.75	759	1328.25	revise settlement term sheet
Jason	Rathod	Partner	11/21/2018	0.75	759	569.25	review/revise term sheet
Jason	Rathod	Partner	11/21/2018	0.5	759	379.5	Review order on stay
Jason	Rathod	Partner	11/26/2018	3.75	759	2846.25	Review/revise term sheet
Jason	Rathod	Partner	11/26/2018	0.5	759	379.5	Call with opposing counsel
Jason	Rathod	Partner	11/27/2018	0.75	759	569.25	Call with opposing counsel re settlement, prep re same
Jason	Rathod	Partner	11/28/2018	0.25	759	189.75	Confirm extension
Jason	Rathod	Partner	11/28/2018	2.5	759	1897.5	Revise and send term sheet
Jason	Rathod	Partner	11/29/2018	0.5	759	379.5	Mediation call
Jason	Rathod	Partner	11/29/2018	2.25	759	1707.75	Revise term sheet
Jason	Rathod	Partner	12/1/2018	0.25	759	189.75	Advise third parties of extension
Jason	Rathod	Partner	12/3/2018	3.75	759	2846.25	Review and revise term sheet
Jason	Rathod	Partner	12/4/2018	5.5	759	4174.5	Prep for mediation, revise term sheet; conference with team re same
Jason	Rathod	Partner	12/5/2018	9.5	759	7210.5	Mediation and preparation re same; recap conference with N. Migliaccio
Jason	Rathod	Partner	12/6/2018	3.25	759	2466.75	conferences re 12/6 mediation and strategy moving forward
Jason	Rathod	Partner	12/7/2018	1.5	759	1138.5	Emails re settlement terms; review terms
Jason	Rathod	Partner	12/9/2018	0.5	759	379.5	mediation preparation
Jason	Rathod	Partner	12/10/2018	9.25	759	7020.75	Mediation preparation and travel
Jason	Rathod	Partner	12/11/2018	3.5	759	2656.5	Mediation preparation
Jason	Rathod	Partner	12/12/2018	15	759	11385	Mediation and mediation travel
Jason	Rathod	Partner	12/13/2018	7	759	5313	Mediation travel
Jason	Rathod	Partner	12/17/2018	1	759	759	Emails with team re settlement and monetary demand
Jason	Rathod	Partner	12/18/2018	0.5	759	379.5	Emails re social media post issue raised by defense counsel; conference with N. Migliaccio re same
Jason	Rathod	Partner	12/18/2018	0.5	759	379.5	Follow-up with third parties re subpoena
Jason	Rathod	Partner	12/28/2018	2.5	759	1897.5	Review and revise settlement term sheet
Jason	Rathod	Partner	1/7/2019	3.25	759	2466.75	Edit settlement term sheet
Jason	Rathod	Partner	1/8/2019	2.75	759	2087.25	Edit settlement term sheet, confer with team re same
Jason	Rathod	Partner	1/9/2019	0.25	759	189.75	Review stay request
Jason	Rathod	Partner	1/11/2019	3	759	2277	Settlement call and prep re same
Jason	Rathod	Partner	1/16/2019	0.25	759	189.75	Review email from defense counsel, request filing of stay request
Jason	Rathod	Partner	1/24/2019	1	759	759	Mediation call and preparation re same
Jason	Rathod	Partner	1/31/2019	0.25	759	189.75	Email to third party re subpoena
Jason	Rathod	Partner	2/4/2019	0.5	759	379.5	Team call and research re DOI
Jason	Rathod	Partner	2/6/2019	0.75	759	569.25	Call with third party regarding status and email to team re same
Jason	Rathod	Partner	2/8/2019	0.25	759	189.75	Email to mediator
Jason	Rathod	Partner	2/11/2019	0.25	759	189.75	Email to team re third party inquiry
Jason	Rathod	Partner	2/15/2019	1.5	759	1138.5	Review term sheet, team call re same
Jason	Rathod	Partner	2/15/2019	0.25	759	189.75	Call with opposing counsel regarding status
Jason	Rathod	Partner	2/19/2019	0.5	759	379.5	Call with team re mediation, term sheet
Jason	Rathod	Partner	2/21/2019	0.25	759	189.75	Review stipulation
Jason	Rathod	Partner	2/27/2019	2	759	1518	Emails re subpoenas, protective order and review of produced docs
Jason	Rathod	Partner	2/27/2019	1.5	759	1138.5	Edit term sheet

Jason	Rathod	Partner	3/1/2019	0.5	759	379.5	Call re mailing issue in term sheet
Jason	Rathod	Partner	3/1/2019	1	759	759	Finalize term sheet
Jason	Rathod	Partner	3/3/2019	6	759	4554	Draft and send mediation statement
Jason	Rathod	Partner	3/5/2019	1	759	759	Finalize and send term sheet
Jason	Rathod	Partner	3/6/2019	1.5	759	1138.5	Prepare for mediation
Jason	Rathod	Partner	3/14/2019	10.5	759	7969.5	Travel and prepare for mediation
Jason	Rathod	Partner	3/15/2019	10	759	7590	Prep for and attend mediation
Jason	Rathod	Partner	3/16/2019	5	759	3795	Travel back to DC following mediation
Jason	Rathod	Partner	3/18/2019	0.8	759	607.2	Call with defense counsel Michael Hassen re mediation post-mortem and email to team re same
Jason	Rathod	Partner	3/22/2019	0.8	759	607.2	Emails re settlement with defense counsel Mary Donne Peters
Jason	Rathod	Partner	3/22/2019	0.5	759	379.5	Update to ninth circuit mediator
Jason	Rathod	Partner	3/26/2019	0.8	759	607.2	review settlement offer from defense counsel
Jason	Rathod	Partner	3/28/2019	0.5	759	379.5	Emails with team regarding settlement update
Jason	Rathod	Partner	3/29/2019	0.7	759	531.3	Call with team re Libre's latest proposal; prep re same
Jason	Rathod	Partner	3/29/2019	0.9	759	683.1	Call with Mary Donne Peters (defense counsel) re settlement and recap to team
Jason	Rathod	Partner	3/30/2019	0.6	759	455.4	Review Mary Donne Peters (defense counsel) email re settlement
Jason	Rathod	Partner	4/10/2019	0.6	759	455.4	Prepare and send email to defense counsel re restarting discovery
Jason	Rathod	Partner	4/11/2019	0.5	759	379.5	Emails to third party subpoenas re lifting of stay
Jason	Rathod	Partner	4/12/2019	0.4	759	303.6	Review settlement thoughts from Centro; email team re same
Jason	Rathod	Partner	4/16/2019	1	759	759	Review settlement proposal pitch from Centro
Jason	Rathod	Partner	4/17/2019	0.8	759	607.2	Emails re DOI production
Jason	Rathod	Partner	4/22/2019	1.5	759	1138.5	Research MTC, Judge Wilken's rules re same, and model letters in preparation for MTC
Jason	Rathod	Partner	4/22/2019	0.2	759	151.8	respond to Ninth Circuit mediator re status
Jason	Rathod	Partner	4/24/2019	0.4	759	303.6	review response to settlement from Libre
Jason	Rathod	Partner	4/24/2019	1.5	759	1138.5	Draft letter to the court re deficiencies
Jason	Rathod	Partner	4/24/2019	0.5	759	379.5	Emails to defense counsel re deficiencies
Jason	Rathod	Partner	4/25/2019	0.4	759	303.6	Update call with Ninth Circuit mediator; prep re same
Jason	Rathod	Partner	4/25/2019	1	759	759	Emails re discovery deficiencies and third party subpoenas
Jason	Rathod	Partner	4/25/2019	0.3	759	227.7	Email to defense counsel re mediation before Jill Sperber
Jason	Rathod	Partner	4/26/2019	1	759	759	Emails re deficient document production and motion to quash
Jason	Rathod	Partner	4/26/2019	0.4	759	303.6	Review objections in response to third party subpoena from Statewide Bonding
Jason	Rathod	Partner	5/1/2019	0.5	759	379.5	Emails re scheduling follow up mediation with Jill Sperber
Jason	Rathod	Partner	5/1/2019	0.6	759	455.4	Prepare and send letter to court sent to defense counsel to meet and confer on
Jason	Rathod	Partner	5/2/2019	2.5	759	1897.5	identify witnesses to depose and prepare notices
Jason	Rathod	Partner	5/3/2019	0.2	759	151.8	Serve deposition notices
Jason	Rathod	Partner	5/3/2019	0.4	759	303.6	follow-up re discovery deficiencies
Jason	Rathod	Partner	5/7/2019	0.2	759	151.8	Email to third party RLI re enforcing subpoena
Jason	Rathod	Partner	5/7/2019	0.7	759	531.3	Email to defense counsel re discovery deficiencies, involving court if meet and confer not scheduled
Jason	Rathod	Partner	5/9/2019	0.3	759	227.7	Email to defense counsel re discovery deficiencies
Jason	Rathod	Partner	5/10/2019	0.4	759	303.6	Email to defense counsel re discovery deficiencies
Jason	Rathod	Partner	5/13/2019	1.5	759	1138.5	Meet and confer call with defense counsel re discovery deficiencies and prep re same
Jason	Rathod	Partner	5/15/2019	1.6	759	1214.4	Call with defense counsel re discovery deficiencies and prep re same
Jason	Rathod	Partner	5/21/2019	4	759	3036	Draft lengthy deficiency letter detailing compromises and next steps
Jason	Rathod	Partner	5/21/2019	0.4	759	303.6	Email re defendant's response to deficiency letter
Jason	Rathod	Partner	5/23/2019	0.4	759	303.6	Draft letter to court in preparation for motion to compel with room for defendant to insert position
Jason	Rathod	Partner	5/23/2019	0.5	759	379.5	Emails introduction to new defendant counsel and response re outstanding discovery
Jason	Rathod	Partner	5/24/2019	0.8	759	607.2	Call with new defense counsel and prep re same
Jason	Rathod	Partner	5/24/2019	0.4	759	303.6	Review stip and proposed order
Jason	Rathod	Partner	5/29/2019	0.8	759	607.2	Emails re MOU and supplemental discovery



Jason	Rathod	Partner	5/30/2019	0.4	759	303.6	Emails re mediation materials
Jason	Rathod	Partner	5/31/2019	1.9	759	1442.1	Call re settlement and preparation re same
Jason	Rathod	Partner	5/31/2019	0.4	759	303.6	Call re doc production
Jason	Rathod	Partner	6/6/2019	0.3	759	227.7	Follow-up re status of discovery and new term sheet
Jason	Rathod	Partner	6/14/2019	1	759	759	Emails re document production, mediation status
Jason	Rathod	Partner	6/17/2019	0.5	759	379.5	Correspond with Erick (associate) re downloading Defendant's document production
Jason	Rathod	Partner	6/21/2019	0.8	759	607.2	Emails re mediation scheduling
Jason	Rathod	Partner	6/25/2019	0.3	759	227.7	review stip for extension
Jason	Rathod	Partner	6/27/2019	0.8	759	607.2	Prepare and send cocounsel "care package" for mediator that has relevant case documents
Jason	Rathod	Partner	7/2/2019	0.2	759	151.8	Send Libre JPA for mediator
Jason	Rathod	Partner	7/26/2019	1	759	759	Call with defense counsel Sean Sullivan re settlement and prep re same and recap to team
Jason	Rathod	Partner	7/30/2019	0.9	759	683.1	Call re settlement and prep re same
Jason	Rathod	Partner	8/6/2019	3.5	759	2656.5	Draft mediation statement
Jason	Rathod	Partner	8/7/2019	0.4	759	303.6	Emails to team re settlement terms and negotiation
Jason	Rathod	Partner	8/8/2019	0.2	759	151.8	Emails to team re settlement terms and negotiation
Jason	Rathod	Partner	8/9/2019	1.2	759	910.8	Emails to team re refining term sheet and settlement
Jason	Rathod	Partner	8/9/2019	2.4	759	1821.6	Finalize and send mediation statement
Jason	Rathod	Partner	8/11/2019	0.8	759	607.2	Call with defense counsel in advance of mediation
Jason	Rathod	Partner	8/13/2019	1.2	759	910.8	internal team emails re settlement approach at mediation
Jason	Rathod	Partner	8/13/2019	0.6	759	455.4	Review Defendant's mediation statement
Jason	Rathod	Partner	8/15/2019	8	759	6072	travel and prep re mediation
Jason	Rathod	Partner	8/16/2019	10	759	7590	prep and attend mediation
Jason	Rathod	Partner	8/17/2019	8	759	6072	travel after mediation
Jason	Rathod	Partner	8/27/2019	0.6	759	455.4	Emails with team re priorities for settlement
Jason	Rathod	Partner	8/28/2019	1.5	759	1138.5	Emails with team re priorities at mediation
Jason	Rathod	Partner	8/29/2019	2	759	1518	Emails and calls with team re priorities at mediation
Jason	Rathod	Partner	8/30/2019	1.5	759	1138.5	Emails and calls with team re priorities at mediation
Jason	Rathod	Partner	9/2/2019	1.8	759	1366.2	review revised proposal from Libre and Emails/ calls to cocounsel re same
Jason	Rathod	Partner	9/3/2019	2.5	759	1897.5	Emails with team re mediation priorities / strategy
Jason	Rathod	Partner	9/4/2019	10.5	759	7969.5	Mediation and prep re same
Jason	Rathod	Partner	9/9/2019	0.2	759	151.8	Email re notifying 9th circuit mediator of current status
Jason	Rathod	Partner	9/9/2019	0.2	759	151.8	Call with defense counsel re next steps
Jason	Rathod	Partner	9/17/2019	0.7	759	531.3	Emails re Kevin Calderon's retention / status as class rep
Jason	Rathod	Partner	9/24/2019	0.9	759	683.1	Emails re Kevin Calderon and stip for settlement
Jason	Rathod	Partner	9/30/2019	0.3	759	227.7	emails re revisions to stip for stay
Jason	Rathod	Partner	9/30/2019	0.3	759	227.7	Emails re retainer for Kevin Calderon
Jason	Rathod	Partner	10/1/2019	0.3	759	227.7	Emails to defense counsel re proposed edits to stip
Jason	Rathod	Partner	10/1/2019	0.5	759	379.5	Emails re next steps
Jason	Rathod	Partner	10/2/2019	0.6	759	455.4	Call re next steps with defense counsel and prep re same
Jason	Rathod	Partner	11/5/2019	1.2	759	910.8	review settlement agreement; emails to team re same
Jason	Rathod	Partner	11/7/2019	1.8	759	1366.2	Review settlement agreement; Jesse Newmark's (cocounsel) comments; emails re same
Jason	Rathod	Partner	11/11/2019	1	759	759	Review settlement agreement and email to defense counsel re same
Jason	Rathod	Partner	11/13/2019	0.3	759	227.7	Emails re coordinating call with defense counsel
Jason	Rathod	Partner	11/14/2019	0.8	759	607.2	Call with team and defense counsel; prep re same
Jason	Rathod	Partner	11/19/2019	0.5	759	379.5	Review proposed amended complaint; email re same
Jason	Rathod	Partner	11/21/2019	0.5	759	379.5	Direct E. Quezada re drafting preliminary approval motion
Jason	Rathod	Partner	11/26/2019	1	759	759	Call re finalizing settlement agreement, next steps; prep re same
Jason	Rathod	Partner	12/4/2019	0.5	759	379.5	edits to preliminary approval motion
Jason	Rathod	Partner	12/6/2019	2	759	1518	edits to preliminary approval motion

Jason	Rathod	Partner	12/12/2019	0.5	759	379.5	call re finalizing settlement
Jason	Rathod	Partner	12/12/2019	0.8	759	607.2	Emails re next steps and notice issues
Jason	Rathod	Partner	12/13/2019	0.5	759	379.5	Emails re notice issues
Jason	Rathod	Partner	12/20/2019	1	759	759	Edits / comments to settlement agreement to group
Jason	Rathod	Partner	12/20/2019	2	759	1518	edit preliminary approval brief and send to group
Jason	Rathod	Partner	1/3/2020	0.5	759	379.5	Emails to group re notice program
Jason	Rathod	Partner	1/6/2020	0.4	759	303.6	Emails to group re notice program
Jason	Rathod	Partner	1/7/2020	0.5	759	379.5	Call with proposed settlement administrator
Jason	Rathod	Partner	1/8/2020	1.4	759	1062.6	Circulate draft of proposed order
Jason	Rathod	Partner	1/8/2020	0.8	759	607.2	Edit and send notices
Jason	Rathod	Partner	1/8/2020	0.5	759	379.5	Call with potential claims administrator P&N / Kyle Mason re settlement administration
Jason	Rathod	Partner	1/9/2020	1	759	759	Draft status report
Jason	Rathod	Partner	1/10/2020	0.4	759	303.6	review cost estimate from P&N for settlement administration
Jason	Rathod	Partner	1/16/2020	0.4	759	303.6	Review cost estimate / proposal from JND for administration
Jason	Rathod	Partner	1/20/2020	0.5	759	379.5	Edit notices; Emails re same
Jason	Rathod	Partner	1/21/2020	0.2	759	151.8	Emails to group re notice program
Jason	Rathod	Partner	1/23/2020	0.4	759	303.6	Review Angeion cost proposal
Jason	Rathod	Partner	1/29/2020	0.5	759	379.5	Emails re notices / settlement agreement edits
Jason	Rathod	Partner	1/31/2020	0.8	759	607.2	edit and file stip; Emails re same
Jason	Rathod	Partner	2/2/2020	1.5	759	1138.5	Edits to settlement agreement; send to group
Jason	Rathod	Partner	2/7/2020	0.5	759	379.5	Edits to motion for preliminary approval brief
Jason	Rathod	Partner	2/10/2020	1.4	759	1062.6	Call re edits to settlement agreement and prep re same
Jason	Rathod	Partner	2/11/2020	0.5	759	379.5	Emails re schedule going forward and motion for preliminary approval
Jason	Rathod	Partner	2/13/2020	0.4	759	303.6	Emails re filing stip
Jason	Rathod	Partner	2/14/2020	1.2	759	910.8	Emails re settlement agreement / stip
Jason	Rathod	Partner	2/14/2020	0.6	759	455.4	directing E. Quezada re settlement complaint
Jason	Rathod	Partner	2/17/2020	0.5	759	379.5	Emails re settlement and motion for leave
Jason	Rathod	Partner	2/18/2020	0.5	759	379.5	Emails re next steps in light of Libre's obstruction/delay
Jason	Rathod	Partner	2/19/2020	0.6	759	455.4	call with defense counsel and prep re same
Jason	Rathod	Partner	2/20/2020	0.5	759	379.5	review communications with JND re capped amount
Jason	Rathod	Partner	2/23/2020	1.8	759	1366.2	edit settlement agreement and notices and send to team, highlighting potential issues
Jason	Rathod	Partner	2/24/2020	0.7	759	531.3	finalize and send settlement docs to defense counsel
Jason	Rathod	Partner	2/27/2020	0.3	759	227.7	Emails with team and defense counsel re status
Jason	Rathod	Partner	3/1/2020	0.2	759	151.8	Emails with team defendant and status of settlement
Jason	Rathod	Partner	3/2/2020	0.5	759	379.5	call with defense counsel regarding status of settlement and prep re same
Jason	Rathod	Partner	3/4/2020	0.8	759	607.2	draft and send status report
Jason	Rathod	Partner	3/5/2020	1	759	759	finalize and file status report
Jason	Rathod	Partner	3/6/2020	0.5	759	379.5	coordinate re filing proposed order
Jason	Rathod	Partner	3/9/2020	0.2	759	151.8	email to mediator Jill Sperber
Jason	Rathod	Partner	3/25/2020	0.2	759	151.8	Emails re another possible mediation to resolve outstanding issue
Jason	Rathod	Partner	3/26/2020	0.3	759	227.7	Emails re mediation timing
Jason	Rathod	Partner	3/31/2020	1.4	759	1062.6	Send / edit status report
Jason	Rathod	Partner	4/3/2020	0.4	759	303.6	review court's order re status report; emails re same
Jason	Rathod	Partner	4/6/2020	0.6	759	455.4	Emails re scheduling mediation
Jason	Rathod	Partner	4/7/2020	0.5	759	379.5	mediation call
Jason	Rathod	Partner	4/9/2020	0.2	759	151.8	Emails re mediation scheduling
Jason	Rathod	Partner	4/10/2020	0.4	759	303.6	review status report and emails re same
Jason	Rathod	Partner	5/5/2020	0.8	759	607.2	Emails re mediation and mediation statement
Jason	Rathod	Partner	5/6/2020	1.9	759	1442.1	Edit mediation statement and send; Emails re mediation



Jason	Rathod	Partner	5/12/2020	1.5	759	1138.5	final emails and prep for mediation
Jason	Rathod	Partner	5/13/2020	14	759	10626	prep and attend mediation
Jason	Rathod	Partner	5/14/2020	1.4	759	1062.6	Email follow-ups re mediation, next steps
Jason	Rathod	Partner	5/15/2020	1	759	759	Email follow-ups, including status report
Jason	Rathod	Partner	5/20/2020	1.5	759	1138.5	edit and send motion for preliminary approval
Jason	Rathod	Partner	5/22/2020	0.3	759	227.7	Email to Sean (defense counsel) re declaration from claims administrator
Jason	Rathod	Partner	5/22/2020	0.5	759	379.5	Send email re outstanding exhibits
Jason	Rathod	Partner	5/26/2020	1	759	759	Emails re final approval briefing
Jason	Rathod	Partner	5/27/2020	2	759	1518	edit preliminary approval brief and emails re same
Jason	Rathod	Partner	5/28/2020	0.3	759	227.7	email re amended complaint and motion
Jason	Rathod	Partner	5/29/2020	0.5	759	379.5	Review settlement complaint and motion and emails re same
Jason	Rathod	Partner	5/31/2020	2.5	759	1897.5	Prepare declaration in support of approval
Jason	Rathod	Partner	6/1/2020	12	759	9108	Prepare preliminary approval papers and emails with team re same
Jason	Rathod	Partner	6/2/2020	6	759	4554	Prepare preliminary approval papers and emails with team re same
Jason	Rathod	Partner	6/24/2020	0.7	759	531.3	Call re settlement terms and prep re same
Jason	Rathod	Partner	7/14/2020	0.3	759	227.7	Update Third Circuit mediator and emails with defense counsel re same
Jason	Rathod	Partner	7/17/2020	4	759	3036	Prep for hearing
Jason	Rathod	Partner	7/19/2020	3.2	759	2428.8	Prep for hearing
Jason	Rathod	Partner	7/20/2020	4	759	3036	Prep for hearing
Jason	Rathod	Partner	7/21/2020	0.5	759	379.5	Call with cocounsel in prep for hearing and individual prep re same to identify possible issues
Jason	Rathod	Partner	7/21/2020	6.5	759	4933.5	Prep for hearing
Jason	Rathod	Partner	7/21/2020	0.8	759	607.2	Attend hearing
Jason	Rathod	Partner	7/21/2020	0.2	759	151.8	Call with opposing counsel in advance of hearing
Jason	Rathod	Partner	7/22/2020	0.5	759	379.5	Post-hearing call with defense counsel and prep re same
Jason	Rathod	Partner	7/22/2020	1	759	759	Emails re next steps
Jason	Rathod	Partner	7/22/2020	0.5	759	379.5	edit proposed orders
Jason	Rathod	Partner	7/24/2020	1.5	759	1138.5	review edits to agreement, provide feedback, emails with group re same
Jason	Rathod	Partner	7/24/2020	0.4	759	303.6	review final versions of settlement documents and send to opposing counsel
Jason	Rathod	Partner	7/26/2020	3.5	759	2656.5	edit supplemental submission
Jason	Rathod	Partner	7/27/2020	1	759	759	edit long-form notice
Jason	Rathod	Partner	7/27/2020	2.5	759	1897.5	edit proposed orders / other settlement documents and emails with team re same
Jason	Rathod	Partner	7/28/2020	1.8	759	1366.2	review feedback from defense counsel, confer with team and edit settlement documents
Jason	Rathod	Partner	7/28/2020	6.7	759	5085.3	finalize documents including supplemental brief
Jason	Rathod	Partner	7/28/2020	0.8	759	607.2	prepare, edit and file status report
Jason	Rathod	Partner	7/29/2020	10	759	7590	review/edit/finalize/file settlement docs, provide feedback re same to team
Jason	Rathod	Partner	8/19/2020	1	759	759	Emails and research re settlement question
Jason	Rathod	Partner	8/25/2020	3	759	2277	Research and prepare service award, fee, and cost brief
Jason	Rathod	Partner	8/26/2020	4.5	759	3415.5	Research and prepare service award, fee, and cost brief
Jason	Rathod	Partner	8/27/2020	4.5	759	3415.5	Research and prepare service award, fee, and cost brief
Jason	Rathod	Partner	8/31/2020	3.5	759	2656.5	Edit service award, fee and cost brief; emails with team re same
				717.6		544658	
Nicholas	Migliaccio	Partner	2/10/2017	1.5	759	1138.5	Review complaint
Nicholas	Migliaccio	Partner	5/2/2017	1.25	759	948.75	Reveiw draft Amended Complaint
Nicholas	Migliaccio	Partner	10/12/2017	0.75	759	569.25	Conferences with J. Rathod re mediation
Nicholas	Migliaccio	Partner	3/27/2018	0.75	759	569.25	Review mediation statement
Nicholas	Migliaccio	Partner	6/15/2018	0.5	759	379.5	Review Opposition to Motion to Compel Arbitration
Nicholas	Migliaccio	Partner	9/18/2018	1	759	759	Conferences with third party attorney re potential pro bono involvement
Nicholas	Migliaccio	Partner	10/16/2018	1.25	759	948.75	Review briefs (including for opposition to motion to stay) and conference with J. Rathod re same

Nicholas	Migliaccio	Partner	10/23/2018	0.75	759	569.25	Review draft Opposition to Motion to Stay
Nicholas	Migliaccio	Partner	11/20/2018	1.25	759	948.75	Review Order denying Motion to Stay; conference with J. Rathod re same
Nicholas	Migliaccio	Partner	12/3/2018	1.25	759	948.75	Review order granting leave to amend; conference with J. Rathod re same
Nicholas	Migliaccio	Partner	12/4/2018	3.5	759	2656.5	Prep for mediation; review file and materials in advance; conference with J. Rathod re same
Nicholas	Migliaccio	Partner	12/5/2018	9.5	759	7210.5	Mediation with opposing counsel and J. Rathod; review materials re same; conference with J. Rathod re same
Nicholas	Migliaccio	Partner	12/9/2018	1	759	759	Prepare for mediation
Nicholas	Migliaccio	Partner	12/10/2018	9.5	759	7210.5	Mediation prep and travel; conference with J. Rathod re same
Nicholas	Migliaccio	Partner	12/11/2018	1.5	759	1138.5	Mediation prep
Nicholas	Migliaccio	Partner	12/12/2018	13	759	9867	Mediation and return travel to DC
Nicholas	Migliaccio	Partner	12/17/2018	1.25	759	948.75	Emails re outstanding settlement issues; calls re same; conference with J. Rathod
Nicholas	Migliaccio	Partner	1/7/2019	1.5	759	1138.5	Review term sheet and call re same
Nicholas	Migliaccio	Partner	1/11/2019	1.75	759	1328.25	Call with co-counsel re settlement issues; review materials re same; review term sheet
				52.75		40037.3	